



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

MAR 01 1985

CERTIFIED MAIL

Return Receipt Requested

Mr. Kenneth M. Perica
Environmental Protection Engineer
Monsanto Company-JF Queeny Plant
1700 South Second Street
St. Louis, Missouri 63177

Dear Mr. Perica:

RE: Monsanto Company-JF Queeny Plant, MOD004954111

On November 8, 1984, the Resource Conservation and Recovery Act (RCRA) was amended. As you are probably aware, the RCRA amendments impact all types of hazardous waste treatment, storage or disposal facilities. The provision of most concern at this time is the continuing releases provision of Section 3004(u). This provision requires that all permits issued after the date of enactment must address releases of hazardous waste or hazardous constituents from any solid waste management unit, regardless of when the waste was placed in the unit, or whether the unit is closed. Permits issued under Section 3005 of RCRA will contain compliance schedules for completion of corrective action where corrective action is required and cannot be completed prior to permit issuance. Also, the owner/operator must provide financial assurance to ensure cleanup of such releases.

Section 3007 of RCRA, 42 U.S.C. Section 6927, allows the Environmental Protection Agency (EPA) to request certain information from parties who handle hazardous waste as that term is defined in Section 1004 of RCRA, 42 U.S.C. Section 6904. Pursuant to the provisions of this Section, we hereby request that you respond to the attached questionnaire addressing the continuing releases provision. Please complete the attached questionnaire, and return to our office within 30 days of receipt of this letter.

Your failure to respond to this questionnaire within the time specified above may subject you to an enforcement action under Section 3008 of RCRA, 42 U.S.C. Section 6928. Such enforcement action may include the assessment of penalties of up to \$25,000 for each day of noncompliance.

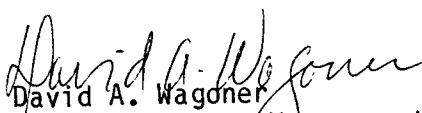


R00105738
RCRA RECORDS CENTER

If you have reason to believe the information which you submit constitutes legitimate trade secrets or business confidential information, and wish to assert a business confidentiality claim covering all or part of the information herein requested, you should place on (or attach to) the information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent and by means of procedures set forth in Subpart B, Part 2, Code of Federal Regulations (41 FR 36906, September 1, 1976, as modified at 43 FR 39997, September 8, 1978). If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.

Use of the attached form is voluntary; however, the information is required. If you find that the attached form is inadequate for reporting purposes, please provide the required information in a supplemental attachment. Please note that the information must be complete and accurate and must include a certification by a principal corporate official as described on page 2 of the attached form. You are requested to submit this information to Lyndell L. Harrington, Permits Section, RCRA Branch, within 30 days of receipt of this letter as stated above.

Sincerely yours,


David A. Wagoner

Director, Waste Management Division

Attachment

cc: John Doyle, MDNR

P. 4

869 703

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Mr. Kenneth M. Perica
Environmental Protection Er
 Monsanto Company-JF Queeny
1700 South Second Street
St. Louis, Missouri 63177

Postage**\$****Certified Fee****Special Delivery Fee****Restricted Delivery Fee****Return Receipt Showing
to whom and Date Delivered****Return Receipt Showing to whom,
Date, and Address of Delivery****TOTAL Postage and Fees****\$****Postmark or Date****MAR 01 1985**

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
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1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified-mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in Item 1 of Form 3811
6. Save this receipt and present it if you make inquiry

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

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- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

**RETURN
TO**



U. S. EPA REGION VII
PERMIT SECTION

**PENALTY FOR PRIVATE
USE, \$300**

WASTE MANAGEMENT BRANCH

324 EAST 11th STREET

KANSAS CITY, MO 64106

(Name of Sender)

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

(City, State, and ZIP Code)

SENDER: Complete items 1, 2, 3 and 4.

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- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

Mr. Kenneth M. Perica

Environmental Protection Engineer
Monsanto Company-JF Queeny Plant
1700 South Second Street
St. Louis, Missouri 63177

4. Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Article Number

P486 869 703

Always obtain signature of addressee or agent and
DATE DELIVERED.

5. Signature - Addressee

X

6. Signature - Agent

X

7. Date of Delivery

MAR 04 1985

8. Addressee's Address (ONLY if requested and fee paid)